

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DANIEL MEYER, MEARON OKONSKY,  
and ANDREA CAPANI Derivatively on  
Behalf of Nominal Defendant ASTRA  
SPACE INC. (F/K/A HOLICITY INC.),

Plaintiffs,

v.

CHRIS C. KEMP, ADAM LONDON,  
CRAIG O. MCCAWE, SCOTT  
STANFORD, MICHAEL LEHMAN,  
MICHÈLE FLOURNOY, LISA NELSON,  
KELYN BRANNON, AND STEVEN  
EDNIE,

Defendants,

and,

ASTRA SPACE INC. (F/K/A HOLICITY  
INC.),

Nominal Defendant.

Case No. 1:22-cv-00308-CJB

**STIPULATION AND [PROPOSED] ORDER TO DISMISS THE  
DERIVATIVE ACTION WITHOUT PREJUDICE**

**WHEREAS**, on March 8, 2022, Plaintiffs filed a Verified Stockholder Derivative Complaint (the “Complaint”) in this action;

**WHEREAS**, on May 20, 2022, Defendants filed a Motion to Dismiss with Opening Brief in support thereof (the “Motion”) (D.I. No. 8);

**WHEREAS**, the Parties met and conferred and set a schedule for Plaintiffs’ response to the motion to dismiss (D.I. No. 9);

**WHEREAS**, the Parties thereafter met and conferred as to the motion to dismiss and

have determined at this time that a stipulated dismissal without prejudice is appropriate;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by the Parties hereto, through their undersigned counsel, as follows:

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the undersigned counsel hereby stipulate that all claims brought by Plaintiffs in this Derivative Action against the Derivative Defendants be dismissed in their entirety without prejudice, each side to bear its own costs and expenses. The undersigned counsel will not contest that counsel and the Parties have complied with the provisions of Federal Rule of Civil Procedure 11.

Dated: July 8, 2022

/s/ Ryan M. Ernst

Ryan M. Ernst, Esq. (No. 4788)

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*Attorneys for the Individual Defendants and  
Nominal Defendant Astra Space Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2022.

\_\_\_\_\_  
United States Magistrate Judge